

## Exhibit A

## Universal Service Administrative Company

## Schools and Libraries

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**Alternative Discount Mechanisms Fact Sheet**

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**1. Primary measure for E-rate**

The primary measure for determining E-rate discounts is the percentage of students eligible for free and reduced lunches under the National School Lunch Program, calculated by individual school. Students from family units whose income is at or below 185% of the federal poverty guideline are eligible for the NSLP.

The FCC's rationale for using NSLP data is as follows:

"[T]he national school lunch program determines students' eligibility for free or reduced-price lunches based on family income, which is a more accurate measure of a school's level of need than a model that considers general community income."

— FCC 97-157 ¶ 509

A chart defining the Income Eligibility Guidelines (IEG) for NSLP eligibility for the current year (07/01/2000 – 06/30-2001) is available by [clicking here](#).

**2. Alternative mechanisms**

The FCC also sanctions other mechanisms to determine a school's level of need, as long as those mechanisms are based on — or do not exceed — the same measure of poverty used by NSLP:

"[A] school may use either an actual count of students eligible for the national school lunch program or federally-approved alternative mechanisms to determine the level of poverty for purposes of the universal service discount program...

"[S]chools that choose not to use an actual count of students eligible for the national school lunch program may use only the federally-approved alternative mechanisms contained in Title I of the Improving America's School Act, which equate one measure of poverty with another."

— FCC 97-157 ¶ 510

These federally-approved alternative mechanisms use data comparable to NSLP data which are:

- (1) [c]ollected through alternative means such as a survey; or
- (2) [f]rom existing sources such AFDC or tuition scholarship programs."

— 34 CFR Ch. II, § 200.28 (a)(2)(i)(B)(1) and (2)

### **3. Survey guidelines**

If a school chooses to do a survey, the following guidelines apply:

- a. The survey must be sent to all families whose children attend the school.
- b. The survey must attain a return rate of at least 50%.
- c. The survey must, at a minimum, contain the following information:
  - o Address of family
  - o Grade level of each child
  - o Size of the family
  - o Income level of the parents
- d. The survey must assure confidentiality. (The names of the families are not required.)

### **4. Acceptable alternative measures of poverty**

The following measures of poverty are currently acceptable alternatives to NSLP eligibility:

- a. Family income level at or below 185% of the federal poverty guideline cited above.
- b. Participation in one or more of the following programs:
  - o Medicaid
  - o Food stamps
  - o Supplementary Security Income (SSI)
  - o Federal public housing assistance or Section 8 (a federal housing assistance program administered by the Department of Housing and Urban Development)
  - o Low Income Home Energy Assistance Program

Participation in Temporary Assistance for Needy Families (TANF) is an acceptable alternative measure of poverty ONLY IF the family income of participants is at or below the IEG for NSLP. Similarly, participation in need-based tuition assistance programs is acceptable if the family income of participants is at or below the IEG for NSLP.

### **5. Existing sources**

Schools may also use existing sources of data which measure levels of poverty, such as TANF or need-based tuition assistance programs. However, these measures are acceptable for E-rate purposes only if the family income of participants is at or below the IEG for NSLP.

### **6. Matching siblings**

The siblings of a student in a school that has established that the student's family income is at or below the IEG for NSLP may also be counted as eligible for E-rate purposes by the respective schools the siblings attend. For example, an elementary school has established, through a survey, that a student's family income is at or below the IEG for NSLP. That student has a brother and a sister who attend the local high school. The high school may use the status of the elementary school sibling to count his high school siblings as eligible for E-rate purposes, without collecting its own data on that family.

rate purposes, without collecting its own data on that family.

## **7. Projections based on surveys**

If a school has sent a questionnaire to all of its families, and if it receives a return rate of at least 50 percent of those questionnaires, it may use that data to project the percentage of eligibility for E-rate purposes for all students in the school. For example, a school with 100 students sent a questionnaire to the 100 homes of those students, and 75 of those families returned the questionnaire. The school finds that the incomes of 25 of those 75 families are at or below the IEG for NSLP. Consequently, 33 percent of the students from those families are eligible for E-rate purposes. The school may then project from that sample to conclude that 33 percent of the total enrollment, or 33 of the 100 students in the school, are eligible for E-rate purposes.

## **8. Unacceptable alternative mechanisms**

The following alternative measures of poverty are NOT acceptable for determining E-rate discounts. They rely on projections rather than on the collection of actual data:

- a. Feeder school method. This method projects the number of low-income students in a middle or high school based on the average poverty rate of the elementary school(s) which "feeds" students to the middle or high school.
- b. Proportional method. This method projects the number of low-income students in a school using an estimate of local poverty.
- c. Extrapolation from non-random samples. This method uses a non-random sample of students chosen to derive the percentage of poverty in a school, such as those families personally know by the principal ("Principal's method") or the families of students who apply for financial aid (a non-random sample).
- d. Title 1 eligibility. This method uses eligibility for Title 1 funds as the criterion for estimating the level of poverty in a particular school. Some measures of poverty eligible under Title 1 are indirect estimates of poverty, and do not necessarily equate to the measure of poverty for E-rate, namely eligibility for NSLP.

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## Step 5: Alternative Discount Mechanisms Fact Sheet

Schools may use alternative calculation methods to determine the level of need for calculating discounts for eligible products and services.

This fact sheet provides the following information on alternative calculation methods for determining the level of need for calculating discounts for eligible products and services.

1. Primary measure for Schools and Libraries discounts
2. Alternative methods
3. Survey guidelines
4. Acceptable alternative measures of poverty
5. Existing sources
6. Matching siblings
7. Projections based on surveys
8. Unacceptable alternative methods

### Step 5: Calculate the Discount Level

Urban or Rural
Non-Instructional Facilities
Discount Matrix
Alternative Discount Mechanisms
Library Consortium FAQ

#### 1. Primary measure for Schools and Libraries discounts

The primary measure for determining discounts is the percentage of students eligible for free and reduced lunches under the National School Lunch Program (NSLP), calculated by individual school. Students from family units whose income is at or below 185% of the federal poverty guideline are eligible for the NSLP.

#### 2. Alternative methods

The Federal Communications Commission (FCC) also allows other methods to determine a school's level of need, as long as those methods are based on - or do not exceed - the same measure of poverty used by NSLP.

These federally-approved alternative methods use data comparable to NSLP data which are:

- collected through alternative means such as a survey; or
- from existing sources such as Aid to Families with Dependent Children or tuition scholarship programs.

#### 3. Survey guidelines

If a school chooses to do a survey, the following guidelines apply:

1. The survey must be sent to all families whose children attend the school.
2. The survey must attain a response rate of at least 50%.
3. The survey must, at a minimum, contain the following information:
  - Address of family
  - Grade level of each child
  - Size of the family
  - Income level of the parents
4. The survey must assure confidentiality (e.g., the names of the families are not required)

#### 4. Acceptable alternative measures of poverty

The following measures of poverty are currently acceptable alternatives to NSLP eligibility:

1. Family income level at or below 185% of the federal poverty guideline.
2. Participation in one or more of the following programs:
  - Medicaid
  - Food stamps
  - Supplementary Security Income (SSI)
  - Federal public housing assistance or Section 8 (a federal housing assistance program administered by the Department of Housing and Urban Development)
  - Low Income Home Energy Assistance Program

#### 5. Existing sources

Schools may also use existing sources of data that measure levels of poverty, such as TANF or need-based tuition

- assistance programs. However, these measures are acceptable for Schools and Libraries Program discount purposes only if the family income of participants is at or below the Income Eligibility Guidelines (IEG) for NSLP.

#### 6. Matching siblings

The siblings of a student in a school that has established that the student's family income is at or below the IEG for NSLP may also be counted as eligible for discount purposes by the respective schools the siblings attend.

For example, an elementary school has established through a survey that a student's family income is at or below the IEG for NSLP. That student has a brother and a sister who attend the local high school. The high school may use the status of the elementary school sibling to count his high school siblings as eligible for discount purposes, without collecting its own data on that family.

#### 7. Projections based on surveys

If a school has sent a questionnaire to all of its families and it receives a response rate of at least 50 percent, it may use that data to project the percentage of eligibility for discount purposes for all students in the school.

For example, a school with 100 students sends a questionnaire to the 100 homes of those students and 75 of those families return the questionnaire. The school finds that the incomes of 25 of those 75 families are at or below the IEG for NSLP. Consequently, 33 percent of the students from those families are eligible for Schools and Libraries support purposes. The school may then project from that sample to conclude that 33 percent of the total enrollment, or 33 of the 100 students in the school, are eligible for the purpose of calculating discounts.

#### 8. Unacceptable alternative methods

The following alternative measures of poverty are NOT acceptable for determining discounts. They rely on projections rather than on the collection of actual data:

- **Feeder school method.** This method projects the number of low-income students in a middle or high school based on the average poverty rate of the elementary school(s) which "feeds" students to the middle or high school.
- **Proportional method.** This method projects the number of low-income students in a school using an estimate of local poverty.
- **Extrapolation from non-random samples.** This method uses a non-random sample of students chosen to derive the percentage of poverty in a school, such as those families personally known by the principal ("Principal's method") or the families of students that apply for financial aid (a non-random sample).
- **Title 1 eligibility.** This method uses eligibility for Title 1 funds as the criterion for estimating the level of poverty in a particular school. Some measures of poverty eligible under Title 1 are indirect estimates of poverty and do not necessarily equate to the measure of poverty for the Schools and Libraries program discounts, namely eligibility for NSLP.

<b>Step 4</b>	Select a Service Provider Process	<b>Step 6</b>	Determine Your Eligible Services
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## Exhibit B

July 11, 2005

Mike Maciej  
Schools And Libraries Division  
Program Integrity Assurance  
Phone: 973-560-4467  
FAX: 973-599-6513  
[mmaciej@sl.universalservice.org](mailto:mmaciej@sl.universalservice.org)

RE: Lima Schools App. 470234 & 470257

Dear Mike,

Here are the answers to your PIA questions from June 27, 2005.

QUESTION

On your Form 471 applications 470234 & 470257, you stated that you used an alternative discount mechanism to calculate the number of students eligible for NSLP, for the following entity: Heritage Elementary School (BEN 50855).

Please provide a complete description of the methodology used to calculate the number of students eligible for NSLP.

ANSWER: The district sent surveys/applications to each household in the district, except direct certified students. The surveys/applications plus the direct certified letters cover every student in the district. After the forms were returned, the district reviewed them to ascertain eligibility for free and reduced lunch. After this was done, the survey methodology alternative discount mechanism was utilized.

QUESTION

If a survey method was used to calculate the number of students eligible for NSLP, please provide the following information:

- 1.) The date that the survey was conducted  
ANSWER: See letter from Food Service Director.
- 2.) The number of students enrolled in the school at the time of the survey  
ANSWER: See letter from Food Service Director.
- 3.) The number of families that were sent the survey (the number of surveys sent out)  
ANSWER: See letter from Food Service Director.
- 4.) The number of surveys returned  
ANSWER: See letter from Food Service Director.
- 5.) The number of students determined to be eligible for NSLP based on the returned surveys  
ANSWER: See letter from Food Service Director.
- 6.) Provide copies of all returned surveys with the child's personal information blackened out to ensure confidentiality, but retaining the information that helped you determine if the family was eligible for Free & Reduced Lunch.



ANSWER: Submitted in this mailing.

- 7.) Indications on each survey form or on a separate sheet of the Free & Reduced Lunch Eligibility determination for EACH survey.

ANSWER: Each form has been circled in the area that shows that the student is eligible or ineligible for free or reduced lunch. This chart is a review of the forms.

Survey/Application #	Quantity Forms	Description	Total F&R
Eligible			
F 1 – F 226	226	Free lunch	226
R 1 – R 54	54	Reduced lunch	54
DC 1 – DC 57	57	Direct Certified	57
Subtotal eligible	337		337
	Quantity Forms	Description	Total Denied
Ineligible			
D 1 – D 26	26	Denied free or reduced	26
Subtotal ineligible	26		26
<b>TOTAL SURVEY/APPLICATIONS</b>	<b>363 forms</b>		

- 8.) A signed certification that states: "I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 of the Form 471."

ANSWER: See letter from Food Service Director.

- 9.) This information (excluding the surveys and determination sheet, if used) must be in writing on school letterhead and signed by a school official (such as the Principal, Vice-Principal, Superintendent (or chief school official), or Director of Food Services).

ANSWER: See letter from Food Service Director.

Thank you,

Cathy Woodward

<District Letterhead>

TO: SLD  
RE: eRate Applications 470234 & 470257

Below is the requested information.

Building	Heritage Elementary School
Date	July 1, 2004 to Feb 11, 2005
Enrollment at time of survey/application	491
# Surveys/ Applications Sent	491
# Surveys/ Applications Returned	363
# Students Qualified for NSLP	337

I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 of the Form 471.

(Signed)	_____
(Name)	_____
(Title)	<u>Food Services Supervisor</u>
(Date)	_____

# LIMA CITY SCHOOLS 2004-2005 SCHOOL YEAR FREE AND REDUCED PRICE SCHOOL MEALS APPLICATION

F-1

Name of child in school First/Middle/Initial/Last	Date of Birth (month/day/year)	School Name	Grade	Food Stamp or OWF case # (if any) DO NOT USE DIRECTION CARD #
Charles [REDACTED]	5-30-95	Penitence	3RD	

If this is a Foster Child check here ☐ If this application is for a child whose legal responsibility of a welfare agency, court list the amount of the child's personal use monthly income \$ ☐ Skip to Part 2

Name of household member	2. Last month's income and how often it was received Example: \$100/monthly \$100 twice a month \$100 every other week \$100 weekly	3. Check if NO income
[REDACTED]	Earnings from work before deductions	
[REDACTED]	Welfare child support	
[REDACTED]	Pensions and other Social Security	
[REDACTED]	Other	
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		

In adult household member must sign this application if an adult is completed and adult sign on the form with date and signature of the Social Security Number or mark the household member Social Security Number on the back of the application (see page 2)

certify (promise) that all information on this report is true and that all income reported is from the school will not Federal funds based on the information given. I understand that school officials may verify this information and understand that if I purposefully give false information my child may lose meal benefits and I may be prosecuted.

Signature: [REDACTED] Date: 8-11-04

Social Security Number: [REDACTED] ☐ I do not have a Social Security Number

Address: 14 [REDACTED] State: OH Zip Code: 45005

Phone Number: (513) [REDACTED]

Mark one or more racial identities:

☒ Asian ☒ Black or African American ☐ American Indian or Alaska Native ☐ Native Hawaiian or Other Pacific Islander ☐ White

Mark one ethnic identity:

☒ Hispanic or Latino ☐ Not Hispanic or Latino

131032-103

## Exhibit C

**Comment No:** SL2007BE052\_C10

**Condition:** For Funding Year 2006, the Beneficiary utilized NSLP applications as surveys in order to calculate the discount rate using the projection method.

**Criteria:** It is our understanding that the practice of using NSLP applications for the survey method was disallowed in Funding Year 2006.

**Cause:** The Beneficiary used the NSLP application to perform the projection method.

**Effect:** There is no monetary effect related to this matter because this practice was not expressly disallowed by the FCC.

**Recommendation:** We recommend the Beneficiary review all published information to ensure discount calculations are performed in accordance with practices allowed at the time of the calculation.

**Beneficiary Response:**

The Lima City School District used one of the alternative proscribed methods of calculation that were in place at the time of the filing.

In regards to the SLD's recommendation: We will continue to review all published information for future applications. But, you should be aware that the published information that was available at the time our applications were submitted did NOT disallow the practice of using NSLP applications for the survey.

The first published material excluding NSLP as a survey instrument came in June of 2007 which was long after our applications were submitted. Prior to that date, the SLD website was silent regarding the use of NSLP applications for the survey methodology.

**Finding No:** SL2007BE052\_F01

**Condition:** The Beneficiary did not retain the appropriate, date specific documentation and enrollment data used to calculate its poverty level under the National School Lunch Program (NSLP) and alternative mechanism methods. The Beneficiary did not maintain adequate supporting documentation for the alternative method numbers reported on the Beneficiary's FCC Form 471 for Funding Years 2005 and 2006. The NSLP documentation retained by the Beneficiary was marginally adequate to allow Grant Thornton to test the Beneficiary's NSLP poverty level calculation and calculate an NSLP poverty level percentage for the locations the Beneficiary had used the alternative mechanism.

**Criteria:** Per 47 C.F.R. § 54.516 (a)(1) and 54.504 (c)(1)(x), the Beneficiary is required to retain, to date, all documents related to the application for, receipt, and delivery of discounted telecommunications and other supported services. Also, any other document that demonstrated compliance with the statutory or regulatory requirements for the schools and libraries mechanism is required to be retained to date.

Per 47 C.F.R. § 54.505 (b), the Beneficiary is required to accurately determine its level of poverty, for use in determining its available discount rate, by using the percentage of its student enrollment that is eligible for a free or reduced price lunch under the national school lunch program or a federally approved alternative mechanism in the public school district in which they are located.

Per 47 C.F.R. § 54.505 (c) the Beneficiary shall accurately apply the approved discount matrix, with the correct consideration of urban or rural location, to its determined level of poverty to set its discount rate to be applied to eligible goods and/or services.

**Cause:** Insufficient controls and policies and procedures for the Universal Service Fund application process and inadequate controls related to document retention.

**Effect:** Grant Thornton is unable to rely on the alternative method numbers reported on the Beneficiary's FCC Form 471 for Funding Years 2005 and 2006. However, for the entities that were reported as having used an alternative method, the Beneficiary was able to provide documentation to support a recalculation of the poverty level based on the NSLP method. Based on the recalculation, we determined that the Beneficiary received excess funding of \$60,842.

This condition adversely affects the Beneficiary's ability to comply with the applicable requirements of the program. Accordingly, this condition is a material weakness in internal control.

A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects a beneficiary's ability to comply with the applicable requirements of the FCC's Title 47 C.F.R. § 54.500 through 54.523, as amended, and related FCC Orders such that there is more than a remote likelihood that a noncompliance with the aforementioned requirements that is more than inconsequential will not be prevented or detected by the beneficiary's internal controls. A material weakness is a control deficiency, or combination of control deficiencies, that results in more than a remote likelihood that material noncompliance with the aforementioned requirements will not be prevented or detected by the beneficiary's internal controls.

**Recommendation:** We recommend the adoption of a formal, written documentation policy to ensure compliance with 47 C.F.R. § 54.516 (a)(1) and § 54.504 (c)(1)(x). This should include the documentation policies with respect to data used in supporting its determination of the appropriate poverty level and discount. Such documentation should include the Summary and Detail Reports utilized to support the NSLP and enrollment numbers reported on the FCC Form 471 during the applicable Funding Year. To comply with 47 C.F.R. § 54.505 (b) and 47 C.F.R. § 54.505 (c), the Beneficiary should adopt a formal process to ensure it can adequately support the percentage of its student enrollment that is eligible for a free or reduced price lunch under the either the National School Lunch Program or a federally approved alternative mechanism. This support should include summary data of

eligible children by school, detail of eligible children by school and each child's application and all other documentation used to support the NSLP method or federally approved alternative mechanism.

**Beneficiary Response:**

Lima used alternative mechanism #7 that was shown on the SLD website through June 20, 2008. For your convenience, Attachment #1 has a printout of that documentation. You may also view that document by going to the following URL.

<http://web.archive.org/web/20070609083220/http://www.universalservice.org/sl/applicants/step05/alternative-discount-mechanisms.aspx>

The Lima City School District used the NSLP survey as the survey for the fiscal years 2005 and 2006. This is entirely consistent with the documentation shown in Attachment #1. In addition, before we submitted our applications for 2005 and 2006, we did a thorough search of the SLD website and could not find any documentation prohibiting the use NSLP surveys in conjunction with the alternative methods.

**The following is a summary of the requirements found in Attachment #1.**

**Survey guidelines**

If a school chooses to do a survey, the following guidelines apply:

1. The survey must be sent to all families whose children attend the school.
2. The survey must attain a response rate of at least 50%.
3. The survey must, at a minimum, contain the following information:
  - Address of family
  - Grade level of each child
  - Size of the family
  - Income level of the parents
4. The survey must assure confidentiality (e.g., the names of the families are not required)

**Projections based on surveys**

If a school has sent a questionnaire to all of its families and it receives a response rate of at least 50 percent, it may use that data to project the percentage of eligibility for discount purposes for all students in the school.

For example, a school with 100 students sends a questionnaire to the 100 homes of those students and 75 of those families return the questionnaire. The school finds that the incomes of 25 of those 75 families are at or below the IEG for NSLP. Consequently, 33 percent of the students from those families are eligible for Schools and Libraries support purposes. The school may then project from that sample to conclude that 33 percent of the total enrollment, or 33 of the 100 students in the school, are eligible for the purpose of calculating discounts

**The following detailed explanation of Lima's use of the survey, will confirm that all of the above requirements were met.**

1. The survey must be sent to all families whose children attend the school.

The surveys were included in a registration packet that was sent to each parent who had a student enrolled in grades K-8. Parents with students in more than one building would receive a packet for each building. Every K-8 parent must return this packet in order for their student to be enrolled in the school for that year. This substantiates that the survey was sent to all K-8 families.

All high school students must register for school each year and have a photo id taken at the time of registration. The surveys were part of the registration packets that the high school students picked up when they got their photo id. This substantiates that every family was sent a survey. (This is based

upon the fact that there is a registration card for each student enrolled. In addition there is also a photo id badge for each student at the high school.)

2. The survey must attain a response rate of at least 50%.

The data that the district provided for the alternative method was based on the number of surveys that were filed with the food service department and accepted or denied. For all of our schools we had a response rate of at least 50%.

3. The survey must, at a minimum, contain the following information:

- Address of family
- Grade level of each child
- Size of the family
- Income level of the parents

Our surveys contain the above information.

4. The survey must assure confidentiality (e.g., the names of the families are not required)

Our surveys are kept confidential.

**Additional remarks:**

Finally, our NSLP numbers, and our use of alternative method was questioned extensively in a June 27, 2005 PIA question from the SLD. At that time we gathered 363 applications which represented every application returned, and forwarded them to the PIA reviewer, Mr. Mike Maciej. The fact that Mr. Maciej accepted our response is a strong indicator that our use of the alternative method is acceptable.

For your convenience, Attachment #2 shows the response to Mr. Maciej's June 2005 questions.

Sincerely,

Cathy Woodward



## Exhibit D

**Comment No:** SL2007BE052\_C02

**Condition:** The Beneficiary received Priority 2 services for an entity that was only eligible to receive Priority 1 services. The Academy of Learning, which is a noninstructional facility, received both internal connections and basic maintenance services (Priority 2). The Academy of Learning was not eligible to receive Priority 2 services because the services were not essential to the effective transport of information to an instructional building. Also, The Academy of Learning was not listed on the FCC Form 471.

**Criteria:** Per FCC Form 471 instructions, 47 C.F.R. § 54.504 of the Federal Communications Commission's rules require all Beneficiaries ordering services that are eligible for Universal Service Fund discounts to file the Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrative Company (USAC). The data collected from FCC Form 471 is utilized to ensure that Beneficiaries are receiving the appropriate discount, complying with the eligibility requirements in 47 C.F.R. § 54.501, and taking steps required by 47 C.F.R. § 54.504 that are necessary to use the discounted services effectively. All Beneficiaries ordering services eligible for Universal Service Fund discounts must file this form, individually or as part of a consortium.

**Cause:** Administrative oversight, inadequate controls and policies and procedures for the Universal Service Fund application process.

**Effect:** We identified the internal connections installed at the Academy of Learning and determined that the monetary effect of the internal connections provided to that ineligible facility to be \$5,545. We were unable, however, to determine the monetary effect of the basic maintenance of internal connections because we could not reasonably estimate the cost of the discounted services provided to the Academy of Learning based on the available documentation.

**Recommendation:** We recommend that the Beneficiary adopt a formal process for the Universal Service Fund application process. An effective application process will ensure that the appropriate eligible entities are being included in the determination of the discount percentage and that Universal Service Funds are being utilized appropriately for Priority 1 and Priority 2 services by the eligible entities that are included on the FCC Form 471.

**Beneficiary Response:**

The switch FOC1051Y5F4 that was placed at the Academy of Learning was placed there in error. The switch that was supposed to be placed at the Academy of Learning was FOC0830Z437 which was purchased with district funds and is currently at Heritage Elementary School. This switch will be removed from the Academy of Learning and replaced with the switch from Heritage Elementary School. This change will comply with FCC rules. Switch FOC1051Y5F4 will be utilized in an eligible location. There was no maintenance performed on FOC1051Y5F4, thus no FCC funds were disbursed for maintenance.